

1 Law Offices of
2 DENA MARIE YOUNG (CSB #215344)
3 2751 4th Street, PMB #136
4 Santa Rosa, CA 95405
5 Telephone: (707) 528-9479
6 Facsimile: (707) 692-5314
7 Email: dmyounglaw@gmail.com

8
9 Attorney for Defendant
10 TIMOTHY JEFFREY

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,

15 Case Nos. 3:16-cr-00002-WHA

16 Plaintiff,

17 v.

18 TIMOTHY JEFFREY,

19 Defendant.

20 **MOTION AND [PROPOSED]**
ORDER PERMITTING
COUNSEL TO BRING LAPTOP
INTO SANTA RITA JAIL

21
22 Defendant, TIMOTHY JEFFREY (PFN ULV371), is currently in custody at Santa Rita
23 Jail. To facilitate effective and efficient attorney-client meetings, including the review of relevant
24 case information, counsel requires the use of a laptop during meetings with the client at the jail.
25 Accordingly, counsel requests that the Court issue an order permitting counsel to bring a
26 computer, laptop, or tablet into Santa Rita Jail for use during visitation for case purposes only.

27 Counsel has contacted AUSA Aseem Padukone, who has indicated that he has no
28 objection to this request.

29 Respectfully Submitted,

30 Dated: May 22, 2024

31 /s /
32 DENA MARIE YOUNG

33 Attorney for Defendant
34 TIMOTHY JEFFREY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.
TIMOTHY JEFFREY,
Defendant.

Case Nos. 3:16-cr-00002-WHA

**MOTION AND [PROPOSED]
ORDER PERMITTING
COUNSEL TO BRING LAPTOP
INTO SANTA RITA JAIL**

[PROPOSED] ORDER

**TO: YESENIA SANCHEZ, SHERIFF OF ALAMEDA COUNTY, AND TO THE
ALAMEDA COUNTY SHERIFF'S OFFICE AT SANTA RITA JAIL:**

The Court orders that Dena Marie Young, counsel for defendant, TIMOTHY JEFFREY (PFN ULV371), be permitted to bring in and use a computer, laptop, or tablet into Santa Rita Jail during legal visits. Such use is limited to case-related activities. Electronic devices brought into Santa Rita Jail are for the sole purpose of reviewing discovery and legal materials that relate to the criminal case. Counsel shall not access, or attempt to access, the internet or any form of wireless communication (including, but not limited to, WI-FI, LTE, 4G, etc.) with the device while in the jail. Alameda County Sheriff's Office staff may inspect the device for the limited purpose of, and only to the extent necessary for, ensuring that wireless communication is disabled.

IT IS SO ORDERED.

Date

HON. WILLIAM ALSUP
Senior United States District Judge